

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

CAROL ALVAREZ,

Plaintiff,

CASE NO.: 1:24-CV-24135-JEM

v.

UNITED STATES MAGISTRATE  
JUDGE EDUARDO I. SANCHEZ

GOAT HOSPITALITY GROUP LLC,  
and WGOAT15 LLC,

Defendants.

/

**NOTICE OF EXPIRATION OF RESPONSE DEADLINE**

Plaintiff, CAROL ALVAREZ, by and through her undersigned counsel, hereby respectfully notifies the Court that the deadline for Defendants, GOAT HOSPITALITY GROUP LLC and WGOAT15 LLC, to respond to Plaintiff's Motion to Compel Discovery Responses [ECF No. 25], filed November 20, 2025, has expired.

Pursuant to the Court's Discovery Procedures § I(B), responses to discovery motions must be filed within five business days. Under Local Rule 7.1(c), responses to non-dispositive motions are due within fourteen days. Both deadlines have now expired without a response or request for extension. *See Peleg v. Genovese*, No. 24-CV-23413, 2025 LX 586606, at \*3 (S.D. Fla. Sep. 24, 2025) (Sanchez, M.J.) ("[f]ailure to file a required response 'may be deemed sufficient cause for granting the motion by default'").

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Dated this 5th day of December, 2025,

Respectfully submitted,

**MACDONALD LAW, PLLC**

/s/ *Kyle T. MacDonald*

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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing document is being served on December 5, 2025, on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

By: /s/ Kyle T. MacDonald  
Kyle T. MacDonald, Esq.

**SERVICE LIST**

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